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2 Nevada Bar No. 11405
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

10 JOSE ALEXANDER ESCOBAR,

Plaintiff

V.

14 UNITED STATES OF AMERICA; DOES I
15 through XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive,

Defendants

Case No: 2:22-cv-01419-CDS-DJA

**ORDER GRANTING STIPULATION
FOR CONTINUANCE OF JOINT
PRE-TRIAL ORDER DEADLINE**

(Third Request)

[ECF No. 17]

19 Plaintiff Jose Alexander Escobar and Defendant United States of America, by
20 and through their undersigned counsel, hereby agree and stipulate to extend the deadline to
21 file the joint pretrial order from September 7, 2023, to September 21, 2023. This is the third
22 request to extend the deadline for the joint pretrial order. The basis for the requested extension
23 is set forth below in the Declaration of Daniel C. Tetreault, Esq., counsel for Plaintiff
24 Jose Alexander Escobar.

25 Discovery closed in this matter on May 8, 2023. The joint pretrial order is currently due
26 on July 7, 2023. The reason for this stipulation is that the parties are currently in settlement

1 discussions, and the joint pretrial order will be unnecessary if the parties reach a settlement in
 2 this case.

3 **DECLARATION OF DANIEL C. TETREAU, ESQ IN SUPPORT OF REQUEST TO**
 4 **CONTINUE DEADLINE FOR JOINT PRE-TRIAL ORDER**

5 DANIEL C. TETREAU, ESQ., being first duly sworn, deposes and says:

6 1. I am an attorney duly licensed to practice law in the State of Nevada, and in the
 7 federal District Court in and for the District of Nevada. I am counsel for Plaintiff, JOSE
 8 ALEXANDER ESCOBAR, in Case No. 2:22-cv-01419-CDS-DJA , and I have personal
 9 knowledge of the facts offered herein;

10 2. I joined Plaintiff's law firm on July 17, 2023. Since that time, I have been actively
 11 getting familiarized with the facts and procedural postures of the respective case load assigned to
 12 me;

13 3. One of those cases was the instant matter, styled as *Escobar v. United States*. It is
 14 my understanding that there were active settlement discussions between the United States and
 15 former counsel for Plaintiff;

16 4. I have been in contact with counsel for the United States, Stephen Hanson,
 17 regarding the current posture of settlement discussions, and I have been actively attempting to
 18 contact and convey the offer to Plaintiff in an attempt to determine whether this matter may be
 19 resolved;

20 5. The parties requested a prior extension on August 7, 2023, to extend the date of
 21 the Pre-Trial memorandum. Since that time, I have been actively attempting to contact my client
 22 to attempt to facilitate a potential settlement. The parties are in active discussion regarding
 23 settlement and are hopeful a resolution may be reached. In addition, the undersigned counsel has
 24 recently contracted Covid-19, and due to illness, the parties seek an extension both to attempt to
 25 complete settlement as well as to allow counsel to recover sufficiently.

26 6. Therefore, the parties respectfully request an additional two-week (14) day
 27 extension to the deadline to file the Joint Pre-Trial Order, or until **September 21, 2023**.



1 7. That I make this Declaration under penalty of perjury and attest to the truth of all
2 matters stated herein.

3 FURTHER DECLARANT SAYETH NAUGHT.

4 DATED this 7th day of September 2023.

5
6 _____
7 _____
8
9
10 For the foregoing reasons, the parties stipulate extending the deadline for the joint pretrial
11 order to **September 21, 2023**.

12 Respectfully submitted this 3rd day of August 2023.
13 DATED this 7th day of September 2023. DATED this 7th day of September 2023.

14 **LADAH LAW FIRM**

15 _____
16 */s/ Daniel C. Tetreault*

17 **RAMZY P. LADAH, ESQ.**

18 Nevada Bar No. 11405

19 **DANIEL C. TETREAULT, ESQ.**

20 Nevada Bar No. 11473

21 517 S. Third Street

22 Las Vegas, NV 89101

23 *Attorneys for Plaintiff*

14 **JASON M. FRIERSON**

15 United States Attorney

16 _____
17 */s/ Stephen R. Hanson II*

18 **STEPHEN R. HANSON II, ESQ.**

19 Assistant United States Attorney

20 **IT IS SO ORDERED.**

21
22
23
24 _____
25 *JMR*
26 _____
27 United States District Judge

28 DATED: September 12, 2023

